

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:14 CR 88 RWS (SPM)
)	
LORENZO GIBBS,)	
)	
Defendant.)	

MOTION TO CONTINUE THE *FRANKS* HEARING

COMES NOW Defendant Lorenzo Gibbs, by and through counsel, and respectfully requests this Court to continue the November 21, 2016 hearing on the *Franks* motions. In support of this Motion, Defendant Gibbs states the following:

1. The *Franks* hearing is scheduled to resume on November 21, 2016, with the testimony of Group Supervisor Keith Cromer. Subpoenas have been issued for two additional witnesses, but it is not known if those subpoenas have been served.
2. Counsel for Defendant Gibbs has reviewed the new telephone data that was recently produced and believes additional telephone data is needed to complete the phone analysis. The Government has advised that this data has been subpoenaed but key portions of the data has not yet been received or analyzed.
3. Counsel anticipates this additional data will be useful in the examination of Mr. Cromer.
4. Counsel for Defendant Gibbs believes a continuance of the November 21 *Franks* hearing is necessary to complete the telephone data analysis and to obtain service on the two additional witnesses.

WHEREFORE, Defendant Lorenzo Gibbs respectfully requests this Court to continue the *Franks* hearing to another date as may be convenient for the Court, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

THE WELBY LAW FIRM, LLC

/S/ Stephen R. Welby

STEPHEN R. WELBY

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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/S/ Stephen R. Welby